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9
10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA, SOUTHERN DIVISION

11 ***

12 JIMMY JIHO PARK, an individual;

13 Plaintiff,

14 vs.

15 GEICO ADVANTAGE INSURANCE
16 COMPANY, a Maryland Corporation; DOES I
through XV, and ROE Corporations I through
17 X, inclusive,

18 Defendants.

CASE NO.: 2:20-cv-1343-JCM-EJY

STIPULATION AND ~~(PROPOSED)~~
ORDER REGARDING DEADLINE TO
FILE ANSWER TO PLAINTIFF'S
COMPLAINT (ECF No. 1-1)

19
20 Plaintiff JIMMY JIHO PARK ("Plaintiff"), by and through his counsel of record, along
21 with Defendant GEICO ADVANTAGE INSURANCE COMPANY ("Defendant"), by and
22 through its counsel of record (collectively, the "Parties"), hereby stipulate and agree that
23 Defendant's Answer to Plaintiff's Complaint (ECF No. 1-1) must be filed no later than September
24 8, 2020. This stipulation arises out of the Parties' agreement to stay discovery as to Plaintiff's
25 Second, Third, and Fourth Causes of Action until resolution of Plaintiff's breach of contract claim
26 and upon Defendant's withdrawal of its pending motions to dismiss and alternatively to bifurcate
27 and stay discovery (ECF Nos. 5 and 6). *See* ECF Nos. 15 and 16.

28 This is the first request to extend the deadline for Defendant's Answer, and the Parties do

1 not intend by it to unduly delay these proceedings. This request reflects the Parties' intention to
2 seek an efficient means to conduct discovery and reach a resolution of Plaintiff's contract claim.

3
4 DATED this 2nd day of September 2020.

DATED this 2nd day of September 2020.

5 LEWIS BRISBOIS BISGAARD & SMITH LLP

V3 LAW, LLC

6 /s/ CHERYL A. GRAMES

/s/ JOSE E. VALENZUELA III

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12
13 **ORDER**

14 **IT IS SO ORDERED.**

15 Dated: September 2, 2020

16 
17 U.S. MAGISTRATE JUDGE